

# Levy Ratner

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### **BY ECF**

Hon. Nusrat J. Choudhury  
100 Federal Plaza  
Central Islip, NY 11722

**Re:      Clarke et al. v. ALAA (2:23-cv-08869)  
Proposed Briefing Schedules**

Dear Judge Choudhury:

On December 8, 2023 you instructed the parties to meet and confer regarding briefing schedules for Plaintiffs' anticipated motion to remand and Defendants' anticipated motion to dismiss. The parties have done so and jointly propose the following schedule:

- December 27, 2023: Defendants file Motion To Dismiss; Plaintiffs file Motion to Remand, if any;
- January 24, 2024: Plaintiffs oppose Motion To Dismiss; if Plaintiffs filed a Motion to Remand, Defendants file opposition;
- January 31, 2024: Defendants reply to Motion to Dismiss; if Plaintiffs filed a Motion to Remand, Plaintiffs file reply.

We believe this proposed briefing schedule provides the parties with sufficient time to submit papers on the respective motions, while allowing the case to move forward in an expeditious manner. Of course, we are amenable to any modifications the Court feels are appropriate.

Respectfully submitted,



Allyson L Belovin